

Ex. B

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF VERMONT

ANNESSA LEWIS,
Plaintiff

v.

BELLOWS FALLS CONGREGATION OF
JEHOVAH'S WITNESSES, BELLOWS
FALLS, VERMONT, INC.; WATCHTOWER
BIBLE AND TRACT SOCIETY OF NEW
YORK, INC.; and NORTON TRUE,
Defendants

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) Docket No. 1:14-cv-205
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PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.

Plaintiff Annessa Lewis, by her attorneys, Gravel & Shea PC, requests that Defendant Watchtower Bible and Tract Society of New York, Inc. produce at the office of Gravel & Shea the documents and materials requested in the manner and within the time provided by rules 33 and 34 of the Federal Rules of Civil Procedure.

Definitions and General Instructions

A. The term "You" or "Your" or "Defendant" refers to all of Watchtower Bible and Tract Society of New York, Inc.'s present, former or retired governing body members, branch committee members, district overseers, circuit overseers, elders, ministerial servants, employees, volunteers, representatives, agents, secretaries, churches, congregations, branches, districts, circuits, schools, principals, teachers, coaches, boards, directors, subsidiaries, counselors,

associates, investigators, independent contractors, accountants, attorneys and affiliated business entities.

B. The term “Perpetrator” refers to Defendant Norton True.

C. The term “Plaintiff” refers to the Plaintiff in this case, Annessa Lewis.

D. The term “Body of Elders Letters” refers to any letter distributed by You to congregations of Jehovah’s Witnesses, including letters addressed: “to all bodies of elders,” “to all bodies of elders in the United States,” “to all bodies of elders in the United States and traveling brothers,” “to all congregations in the United States,” “to all traveling overseers and bodies of elders,” “to all congregations,” “to all bodies of elders and traveling overseers,” “to all presiding overseers,” or “to all bodies of elders and assembly hall committees in the United States.”

E. The term “Document” or “Documents” and “Writing” or “Writings” refers to Documents or electronically stored information as referenced in Fed.R.Civ.P. 34(a).

F. The term “Correspondence” refers to any communication in any manner, whether by memorandum, letter, handwritten note, typewritten note, mail, fax, personal delivery, messenger, e-mail, modem or other electronic, mechanical or manual means.

G. The term “Discipline” or “Disciplinary Action” refers to any type of remedial action taken for infractions against policy, procedure, morals, ethics, religious beliefs, or the law, including, but not limited to, all warnings, suspensions, laicization, leave of absences, foreign assignments, sick leaves, removal of faculties, removal from the clerical state, censures, dismissals, disfellowships, probations, arrests, prosecutions, convictions, sentencing, and/or any expiatory penalty, penal remedy, warning or investigation.

H. The term “Mental Care Provider” refers to any mental health provider, including but not limited to, psychiatrists, psychologist, counselors, therapists, mental health facilities, and mental health institutions, and any of their present or former doctors, nurses, medical assistants, employees, partners, associates, investigators, independent contractors, agents, representatives, accountants or attorneys.

I. The term “Person” or “Persons” refers to individuals, associations, partnerships, corporations, and any other type of entity or institution, whether formed for business purposes or any other purposes.

J. The term “Possession” refers to all Documents, Writings and things in the Possession, custody and/or control of You or Your present, former or retired governing body members, branch committee members, district overseers, circuit overseers, elders, ministerial servants, employees, volunteers, representatives, agents, secretaries, churches, congregations, branches, districts, circuits, schools, principals, teachers, coaches, boards, directors, subsidiaries, counselors, associates, investigators, independent contractors, accountants, attorneys and affiliated business entities.

K. The term “Relate To,” “Relating To,” or “Regarding” refers to, in addition to the customary and usual meaning, constituting, comprising, supporting, diminishing, contradicting, discussing, referring, reflecting, assessing, recording, describing, or in any way relevant to, or discoverable in whole or in part.

L. The terms “And,” “Or,” “And/Or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of this request any information which might be deemed outside their scope by another construction.

M. The term “All” refers to any and all.

Requests for Production of Documents

1. Please produce All Documents Relating To any Disciplinary Action taken against the Perpetrator.
2. Please produce Your file Relating To the Perpetrator.
3. Please produce Your confidential files Relating To the Perpetrator.
4. Please produce All minutes of the meetings of the Personnel Board, Senate, Elders, Board of Consultors, Definitorium, Governing Body OR any other advising body to You Relating To the Perpetrator.
5. Please produce All reports from any meetings of the Personnel Board, Senate, Elders, Board of Consultors, Definitorium, Governing Body OR any other advising body Relating To the Perpetrator.
6. Please produce All Documents Relating To the Perpetrator which were sent to Or received from any Circuit Overseer and You.
7. Please produce any summaries of documents prepared by You Relating To the Perpetrator.
8. Please produce All Documents Relating To allegations, complaints, Or reports of sexual abuse of any minor(s) made against the Perpetrator.
9. Please produce All Documents Relating To investigations of sexual abuse of any minor(s) Regarding the Perpetrator.
10. Please produce All Documents Relating To allegations, complaints, Or reports of sexual abuse of any minor(s) made against the Perpetrator before the Perpetrator was baptized.

11. Please produce All Documents Relating To Your reporting of the Perpetrator's suspected or alleged incidents of sexual abuse of any minor(s) to a child protective agency Or law enforcement agency.

12. Please produce All Documents Relating To any investigations of sexual abuse of any minor(s) by the Perpetrator by a child protective agency Or law enforcement agency.

13. Please produce All Documents Relating To the disfellowship of the Perpetrator including, but not limited to, any petitions, applications, processes, minutes, oppositions, declarations, correspondence, findings, transcripts, Or orders.

14. Please produce All Documents Relating To the Perpetrator's appointment as a ministerial servant.

15. Please produce All Documents Relating To the Perpetrator's appointment as an elder.

16. All Documents that reflect any Mental Care Provider expenses You paid on behalf the Perpetrator, including but not limited to, expenses for evaluations Or treatment.

17. Please produce All Documents that reflect any attorney and/or legal expenses You have paid on behalf of the Perpetrator.

18. Please produce All Documents Relating To any mental Or psychiatric examination, evaluation, investigation, Or analysis of the Perpetrator.

19. Please produce All Documents received by You from any Mental Care Provider Regarding the Perpetrator.

20. Please produce All Documents transferred between You And any Mental Care Provider Regarding the Perpetrator.

21. Please produce All Documents Relating To Your monitoring And/Or supervising the Perpetrator.

22. Please produce All Documents from Or Relating To any church or canonical prosecution of the Perpetrator for sexual abuse of any minor(s) by the Perpetrator.

23. Please produce All Documents from Or Relating To any criminal investigation And/Or prosecution of the Perpetrator for sexual abuse of any minor(s).

24. Please produce All Documents Relating To any lawsuits or claims involving the Perpetrator.

25. Please produce All depositions the Perpetrator has given in any case, administrative action, canon law action, Or litigation.

26. Please produce All depositions given by any Person in any case involving allegations of sexual abuse of any minor(s) by the Perpetrator.

27. Please produce All discovery produced by Or to You in any case involving allegations of sexual abuse of any minor(s) by the Perpetrator.

28. Please produce All photographs, videotapes, And taped recordings taken by the Perpetrator of any minors.

29. Please produce All electronic Documents in which any sexual abuse of any minor(s) by the Perpetrator is discussed, including but not limited to, All digital files and e-mails.

30. Please produce Your diaries And/Or calendars Relating To Or that mention the Perpetrator, including but not limited to, diaries kept by any employee, volunteer, representative, agent, elder, ministerial servant, guardian, Or aftercare monitor or mentor.

31. Please produce All Documents that refer to Annessa Lewis Or any member of her family.

32. Please produce All Documents Relating To complaints made by Annessa Lewis, Or her siblings, relatives, family, Or parents Regarding the Perpetrator.

33. Please produce All Documents Relating To the investigation of complaints Or reports made by Annessa Lewis, Or her siblings, relatives, family, Or parents Regarding the Perpetrator.

34. Please produce All Documents Relating To Your discussions with the Perpetrator Regarding the Perpetrator's alleged sexual abuse of Annessa Lewis.

35. Please produce All Documents Relating To Your policies And/Or procedures from 1980 to the present Relating To allegations of sexual abuse of any minor(s).

36. Please produce All Documents Relating To Your policies And/Or procedures from 1980 to the present to supervise And/Or monitor an elder, ministerial servant, congregant, employee, volunteer, representative Or agent who had allegations of sexual abuse against any minor(s) made against him/her.

37. Please produce All liability insurance policies obtained or purchased by You from 1993 to 1996 and 2013 to 2014.

38. Please produce All Documents Relating To Your organizational structure.

39. Please produce All Documents Relating To the organizational structure of the Jehovah's Witness Church.

40. Please produce All Documents Relating To or describing the duties And obligations of ministerial servants within the Jehovah's Witness Church.

41. Please produce All Documents Relating To or describing the process by which a person is nominated, appointed, evaluated, recommended, approved and installed as a ministerial servant within the Jehovah's Witness Church.

42. Please produce All Documents Relating To or describing the duties And obligations of elders within the Jehovah's Witness Church.

43. Please produce All Documents Relating To or describing the process by which a person is nominated, appointed, evaluated, recommended, approved and installed as an elder within the Jehovah's Witness Church.

44. Please produce All operative iterations of the Documents entitled "Pay Attention to Yourselves and to All the Flock" in effect between 1976 and the present.

45. Please produce All Documents transmitted between You and Defendant Bellows Falls Congregation of Jehovah's Witnesses, Bellows Falls, Vermont, Regarding the Perpetrator at any time.

46. Please produce All form S-79a or S-79a-S forms Relating To the Perpetrator.

47. Please produce All form S-79b or S-79b-S forms Relating To the Perpetrator.

48. Please produce copies of all iterations of Your articles of incorporation.

49. Please produce copies of All iterations of Your corporate charter in effect from 1990 to the present.

50. Please produce copies of All iterations of Your corporate by-laws in effect from 1990 to the present.

51. Please produce copies of All Documents maintained by Your circuit overseers, traveling overseers Or district overseers Relating To Or mentioning the Perpetrator.

52. Please produce All Reports on Circuit Overseer's visit with the congregation, including All S-303 or S-303-S forms Relating To Bellows Falls Congregation of Jehovah's Witnesses, Bellows Falls, Vermont, from 1990 through 2014.

53. Please produce All S-2 or S-2-S forms Relating To Bellows Falls Congregation of Jehovah's Witnesses, Bellows Falls, Vermont, from 1990 through 2014.

54. Please produce All Circuit Files, including All Documents Or files maintained Or generated by Your circuit overseers, traveling overseers OR district overseers Relating To Bellows Falls Congregation of Jehovah's Witnesses, Bellows Falls, Vermont, from 1990 through 2014.

55. Please produce All S-21 or S-21-S forms Regarding the Perpetrator.

56. Please produce All Congregation Reports (Form S-1 or S-1-S) Relating To Bellows Falls Congregation of Jehovah's Witnesses, Bellows Falls, Vermont, from 1990 through 2014.

57. Please produce All letters of introduction Regarding the Perpetrator.

58. Please produce All S-3 or S-3-S forms Regarding the Perpetrator.

59. Please produce All bible study reports Or logs of bible study sessions provided by the Perpetrator.

60. Please produce All publisher cards Regarding the Perpetrator.

61. Please produce All Pioneer applications Relating To the Perpetrator.

62. Please produce All entries on the child molester database maintained Or controlled by You Relating To the Perpetrator Or Any of his known victims.

63. Please produce All Body of Elders letters distributed by You between January 1, 1975 and September 30, 2014.

64. Please produce All Documents transmitted between You and the Christian Congregation of Jehovah's Witnesses, Inc., Regarding the Perpetrator at any time.

65. Please produce All Documents received by You in response to the Body of Elders letter dated March 14, 1997.

66. Please produce All iterations of "Branch Organization" in effect between 1990 and the present.

67. Please produce All Documents referencing allegations of sexual abuse of children within the Jehovah's Witnesses Church since 1960.

68. Please produce all statements made by anyone with knowledge or purporting to have knowledge of the events set out in the Complaint.

69. Please produce any insurance agreement under which any Person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for any payments made to satisfy the judgment.

Dated: Burlington, Vermont
May 20, 2015



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